

The rejection of Claims 2,3,5,6 and 10-12 under 35 U.S.C.102 (b) as anticipated by Trably is considered to lack merit.

Trably is not considered to teach, or even suggest, the filter defined by even Claim 12, the most generic claim. Unlike the filter defined by Claim 12, the filter of Trably does not have a scale collector that has a surface to which scale is attracted, is coupled to a frame having a mesh material, but is separate from this mesh material. The filter cloth 14 of Trably, which the Examiner considers to be a scale collector, is not taught, or even suggested by Trably to be a scale collector and as not shown to attract scale. As shown on page 3, lines 26-35, Trably employs an ion exchange resin to prevent the formation of scale and therefore does not need to employ a scale collector.

The rejection of Claims 2,4-6 and 9-12 under 35 U.S.C. 103(b) as anticipated by Heiligman is considered to lack merit.

Heiligman is not considered to teach, or even suggest, the filter defined by even Claim 12, the most generic claim.

The filter media 52, which the Examiner considers to be a scale collector, unlike the scale collector in the filter defined by Claim 12, is not coupled to the frame (support structure 20).

The rejection of claim 7 under 35 U.S.C. 103(a) as unpatentable over Heiligman is considered to lack merit.

Heiligman is not considered to teach, or even suggest, the filter defined by Claim 7 for reasons given in regard to parent Claim 12. In addition there is no teaching, or even suggestion, in Heiligman of the scale collector being in the form of a compacted mesh block as is the scale collector of the filter defined by Claim 7. The Examiner's statement that it would be obvious for one of ordinary skill in the art to employ a scale collector in the form

of a compacted mesh block is considered to be without merit in the lack of any supporting evidence from the prior art.

The allowability of the subject matter of Claim 13 is noted. An early allowance of the claims and case is requested.

Respectfully submitted,

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CERTIFICATE OF MAILING

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